

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHAEL BUSH,

Plaintiff,

v.

THE WANG CENTER FOR THE  
PERFORMING ARTS, INC.

d/b/a Boch Center,

Defendant.

Case No.: 1:22-cv-10473-NMG

**DEFENDANT’S MOTION FOR A STAY OF DISCOVERY  
PENDING DECISION ON THE WANG CENTER’S MOTION TO DISMISS**

Defendant The Wang Center for the Performing Arts, Inc. d/b/a Boch Center (“The Wang Center”) hereby moves to stay all discovery in this action (“Motion to Stay”) pending a decision on its Motion to Dismiss Plaintiff’s First Amended Complaint (“Motion to Dismiss”). As discussed in the Memorandum in Support of The Wang Center’s Motion to Stay, The Wang Center’s pending Motion to Dismiss is likely to obviate the need for discovery in this case because Plaintiff’s claims are likely to be dismissed as inadequately plead. Granting a temporary Motion to Stay all discovery obligations would therefore be in the interests of efficiency, would conserve the parties’ resources, and would not prejudice the Plaintiff because any resulting delay would be slight. The Wang Center’s Motion to Stay should therefore be granted.

Dated: June 21, 2022

Respectfully submitted,

The Wang Center for the Performing Arts, Inc.  
d/b/a Boch Center

By its attorneys,

/s/ Bruce E. Falby

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**LOCAL RULE 7.1 STATEMENT**

Pursuant to Rule 7.1(a)(2) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for The Wang Center certifies that on June 20, 2022, and June 21, 2022, she reached out via e-mail and phone to Plaintiff to confer regarding the instant Motion to Stay in an effort to resolve or narrow the issues in good faith. Plaintiff responded by email on June 21 that he was available to confer on June 22. Counsel for The Wang Center responded by email describing the Motion to Stay, offering to speak with Mr. Bush any time on the afternoon of June 21, and explaining that they would be filing the Motion on June 21 as it is intertwined with their opposition to Plaintiff's Motion to Compel. Counsel for the Wang Center offered to forgo their motion if Mr. Bush withdrew his and invited an email response if he was unavailable by phone. Mr. Bush did not respond on the afternoon of June 21. Counsel for the Wang Center did not expect that Plaintiff would agree to their offer or to the relief requested in The Wang Center's Motion to Stay discovery in the above-captioned action given that Plaintiff has already filed a Motion to Compel the same discovery.

/s/ Kelsey Tavares  
Kelsey Tavares

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished this 15th day of June 21, 2022 via email and first class mail to:

Michael Bush  
280 Lowell Street  
Carlisle, MA 01741  
[frymesomebacon@protonmail.com](mailto:frymesomebacon@protonmail.com)

*Plaintiff*

/s/ Bruce E. Falby  
Bruce E. Falby